



SOUTH YUBA RIVER CITIZENS LEAGUE

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February 18, 2010

Habitat Expansion Agreement Steering Committee
c/o Chief, Division of Environmental Services
California Department of Water Resources
P.O. Box 942836
Sacramento, CA 94236-0001

Re: Draft Habitat Expansion Plan

Dear HEA Steering Committee:

The South Yuba River Citizens League (SYRCL) is committed to the restoration of salmon and steelhead populations in the Yuba River watershed, and the greater Central Valley. This mission is not unique to SYRCL but shared among many organizations and agencies. I wish to acknowledge the contribution of your committee in preparing a Draft Habitat Expansion Plan which provides valuable information to support recovery actions. I submit these few comments and ask you to consider them in preparing a final plan.

One of the actions in the Draft HEP aims to expand rearing habitat for Chinook salmon and steelhead trout in the lower Yuba River. I appreciate the thorough consideration that you have given to this type of action, including the information I submitted by questionnaire, the information submitted by the Yuba Accord River Management Team and your outreach to landowners. This type of action is closely linked to a project funded by the Anadromous Fish Restoration Program which I manage. The project is in an assessment phase whereby the historic and current conditions, geomorphic and hydrologic processes are being studied for the development of concept projects or actions. I understand the timeline and requirements of the HEA which necessitated a description of a single type of action to be implemented in the next few years. Nonetheless, it is important to realize that while there are many promising types of projects to expand or enhance rearing habitat in the lower Yuba, the best will be borne out of a thorough process of development, scientific and otherwise.

The factors which have limited rearing habitat so dramatically include the artificial constriction of the floodplain, hydrologic alteration effects on riparian, and loss of a large wood supply by upstream dams. Creating or restoring side-channels within the existing floodplain – as proposed in the Draft HEP --- does little to mitigate these impacts. Successful rearing enhancement projects in the lower Yuba River will either remedy these factors or work in concert with physical and biological processes to add habitat value over time. The expansion of functional floodplain habitat may not be feasible

within the schedule of the HEA, but it will be a part of a more far-reaching habitat restoration program. Riparian enhancements, including cottonwood sprigs, will also be a part of the restoration program, and this could be included or more emphasized as part of the existing HEP action.

The primary action for the lower Yuba River is the rehabilitation of spawning habitat in the one-mile reach from Englebright Dam to Deer Creek. While I strongly support this project concept, and collaboration for its design and implementation, I do not see sufficient evidence that the project will meet the biological threshold for habitat expansion or qualify as eligible given existing requirements. The Army Corps of Engineers must implement a gravel augmentation program under the terms of a 2007 Biological Opinion, and the opinion of NMFS seems to be that this would include rehabilitation. Certainly, the ACOE could be required by NMFS, congress or a judge to treat shotrock and place existing gravels. In such a case, only a small portion of the overall biological benefit of rehabilitation could be available as credit to the HEA. Incidentally, I am skeptical of the estimate that rehabilitation would provide for as many as 3000 additional spring-run Chinook salmon.

Section 5.1.2 (Springboard to the Upper Yuba) references the interest of NMFS in a reintroduction of salmon and steelhead above Englebright Dam. This is the interest of SYRCL and other organizations too, and considerable information exists to support reintroduction planning. As I submitted in a distinct questionnaire regarding reintroduction, it seems feasible for the HEP to include a preliminary phase of fish passage into the Upper Yuba involving trap and haul to North Yuba and Middle Yuba Rivers. This type of action seems much more eligible than other actions from the standpoint of the intention of the HEA and the capacity to meet or exceed the expansion threshold.

SYRCL is one of many organizations and stakeholders which will be disappointed if the final HEP involves only marginally successful actions, and does not provide access to habitats currently inaccessible due to dams. We know the primary cause of extinction risk for spring-run Chinook salmon in the Central Valley and we know the bold type of actions required to recover spring-run. Lots of smart people with good intentions (including yourselves) have invested in the HEA. Let's make sure we don't settle for something less than satisfying and successful.

In closing, I wish to confirm my willingness to work with the HEA steering committee in further developing specific action details for the lower Yuba River, particularly if NMFS indicates support for such a HEP. I earnestly hope that the next Draft HEP will advance plans for reintroduction above Englebright, and can pledge much help for that endeavor.

Sincerely,

Gary Reedy